## **EXHIBIT B**

## UNITED STATES DISTRICT COURT EASTERN DISTRICT OF VIRGINIA Alexandria Division

QUILL INK BOOKS LIMITED, Plaintiff,	) ) )
v.	) No. 1:19cv476-LO-MSN
RACHELLE SOTO a/k/a Addison Cain, Defendant.	

## AMENDED NOTICE OF 30(b)(1) DEPOSITION OF MS. ZURI THOMPSON

PLEASE TAKE NOTICE that commencing at 9:00 a.m. on June 8, 2020, at the offices of Craig C. Reilly, 111 Oronoco Street, Alexandria, Virginia 22314, Defendant Rachelle Soto a/k/a Addison Cain ("Cain"), by and through her counsel, will take the deposition upon oral examination of Ms. Zuri Thompson ("Ms. Thompson"), a Director of Plaintiff, Quill Ink Books Limited, pursuant to Rule 30(b)(1) and Local Civil Rule 30(A). The testimony shall be recorded by stenographic means, and may be recorded by videographic means, before a Notary Public or officer authorized by law to administer such oaths and shall continue from day to day until completed.

Dated May 25, 2020

Respectfully Submitted,

/s/ Tynia A. Watson Craig C. Reilly VSB # 20942 111 Oronoco Street Alexandria, Virginia 22314 T: (703) 549-5354 F: (703) 549-5355 E: craig.reilly@ccreillylaw.com Counsel for Defendant

Shawn M. Dellegar, OBA # 20973 Crowe & Dunlevy, P.C. 321 South Boston Avenue, Sutie 500 Tulsa, Oklahoma 74103 T: (918) 592-9800 E: shawn.dellegar@crowedunlevy.com Counsel for Defendant (Pro Hac Vice)

Tynia A. Watson, OBA # 30765 Crowe & Dunlevy, P.C. 324 N. Robinson Ave., Suite 100 Oklahoma City, Oklahoma 73102 T: (405) 235-7500 E: tynia.watson@crowedunlevy.com Counsel for Defendant (Pro Hac Vice)

## **CERTIFICATE OF SERVICE**

I hereby certify that on May 22, 2020, a true and correct copy of the foregoing has been mailed and emailed to the following:

Zuri Thompson Quill Ink Books Limited OFFICE 7 35-37 Ludgate Hill London EC4M 7JN England zoeytellis@gmail.com

> /s/ Tynia A. Watson Crowe & Dunlevy, P.C. 324 N. Robinson Ave., Suite 100 Oklahoma City, Oklahoma 73102 T: (405) 235-7500 E: tynia.watson@crowedunlevy.com

Counsel for Defendant (Pro Hac Vice)